

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., S.A.),

Defendants.

Civil Action No. 03-Civ-11566 (PBS)

**DEXIA BANK BELGIUM'S AMENDED RESPONSES AND OBJECTIONS
TO LEAD PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and the Local Rules of the District of Massachusetts, defendant Dexia Bank Belgium ("Dexia") responds as follows to Lead Plaintiffs' First Set of Interrogatories dated May 19, 2005.

GENERAL OBJECTIONS

1. Dexia objects to each Interrogatory, Instruction or Definition to the extent it seeks to impose obligations beyond those required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it is overly broad, unduly burdensome, duplicative or seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence.
3. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it is vague, ambiguous and does not identify with particularity the information sought.

4. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it would impose undue burden and expense on Dexia.

5. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it seeks information in the possession, custody or control of Plaintiffs.

6. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it seeks documents or information protected from disclosure by the attorney-client privilege, work product doctrine, or other applicable privileges.

7. Dexia objects to each Interrogatory, Instruction or Definition to the extent that it calls for information that is obtainable by Plaintiffs from public sources or other sources that are also available to Plaintiffs.

8. Dexia's investigation of the facts relevant to this action and review of relevant documents is continuing. Dexia reserves the right to amend, modify, or supplement the Responses set forth herein to the extent required or permitted under Rule 26 of the Federal Rules of Civil Procedure. Dexia further reserves the right to rely on any facts, documents or other evidence that may develop or come to its attention at a later date.

SPECIFIC OBJECTIONS AND RESPONSES

Interrogatory No. 1

Identify each of the following persons and state any position(s) each person held at Dexia during the Relevant Time Period, including titles, divisions, office location and years of employment; as well as if such person is currently, or was at any time during the Relevant Period, a director, officer or managing agent of Dexia.

- (a) Peter Rabaey;
- (b) Geert Dauwe;
- (c) Bart Ferrand;
- (d) Piet Cordonnier;
- (e) J.P. Cloes;
- (f) F. Dankelman;
- (g) K. Claessens;
- (h) Bernard Mommens;

(i) Dirk Cools;
(j) Etien Van Coillie;
(k) Filip De Clerck;
(l) F. De Gendt;
(m) C. Seghers;
(n) Patrick Faict;
(o) Gerry Millants;
(p) B. Lamiroy;
(q) S. Vander Elst
(r) M. Coolen;
(s) G. Goffaux;
(t) Th. De Schaepdrijver;
(u) M. Legein;
(v) J.-B. Dubois
(w) J.L. Devogele;
(x) Chr. Giovognoli;
(y) S. Tritz;
(z) K. Van Riet;
(aa) L. Myny;
(bb) P. Van Tiggel;
(cc) D. de Coninck;
(dd) H. Wynants;
(ee) Chr. Vermeylen;
(ff) Claude Piret;
(gg) Rene Avonts
(hh) Stefaan Decraene;
(ii) Jacques Janssens;
(jj) Alain Probst;
(kk) Francois Saverys;
(ll) Philippe Steverlynck;
(mm) Jan Van der Ven;
(nn) Frans Van Deun;
(oo) Nadia Van Hove, and
(pp) Antoone Baert.

Response to Request No. 1

Dexia objects to this Interrogatory to the extent it seeks information concerning "C. Seghers" and "Frans Van Deun" because Dexia cannot identify any current or former employees having these names. Dexia objects to this Interrogatory to the extent it seeks identification of "managing agents" because the determination of whether an individual is a "managing agent" under Fed. R. Civ. P. 30 is a mixed question of law and fact. Without waiving

09/30/2005 17:04 FAX

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005/033

the foregoing objections or the General Objections, and pursuant to the compromise that is memorialized in the September 8, 2005, letter from Jeff Butler to Patrick Egan, Dexia responds to this Interrogatory as follows:

NAME	TIME PERIOD BEGINNING	POSITION, DEPARTMENT, ENTITY, AND LOCATION	OTHER TITLES
Avonts, Rene	January 1996	Lid van het Directiecomité, Paribas, Brussels	Managing Director, Corporate Banking Division
	April 1999	Lid van het Directiecomité, Artesia Banking Corporation, Brussels	Managing Director, Corporate Banking Division
	March 2002	Departed	
Baert, Autoon	January 1996	Kaderlid, Krediet Secretariaat, Paribas, Kortrijk	Verantwoordelijke Kredietsecretariaat West-Vlaanderen/ Credit Manager
	September 1996	Kaderlid, Krediet Secretariaat Vlaanderen, Paribas, Kortrijk	Verantwoordelijke Kredietsecretariaat West-Vlaanderen/ Credit Manager
	March 1997	Kaderlid, Regio Kredieten Vlaanderen, Paribas, Kortrijk	Verantwoordelijke Kredietsecretariaat West-Vlaanderen/ Credit Manager
	June 1999	Kaderlid, Kredieten Vlaanderen, Artesia Banking Corporation, Kortrijk	Verantwoordelijke Kredietsecretariaat West-Vlaanderen/ Credit Manager
	July 2000	Kaderlid, Kredieten Vlaanderen, Artesia Banking Corporation, Brussels	Credit Manager
	May 2002	Kaderlid, Bijzonder beheer, DBB, Brussels	Credit Manager

09/30/2005 17:04 FAX

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006/033

Claessens, Kristin	January 1996	Kaderlid, Productexploitatie en Beheer – Back Office Marktenzaal, Bacob, Brussels	Head/ Verantwoordelijke Productexploitatie en Beheer – Back Office Marktenzaal
	October 1996	Kaderlid, Professionele & Interbancaire Transacties, Bacob, Brussels	Head/ Verantwoordelijke Professionele & Interbancaire Transacties
	January 1998	Directiekaderlid, Professionele & Interbancaire Transacties, Bacob, Brussels	Head/ Verantwoordelijke Professionele & Interbancaire Transacties
	June 1999	Directiekaderlid, Operations Market Transactions, Artesia Banking Corporation, Brussels	Head/ Verantwoordelijke Operations Market Transactions
	January 2000	Directiekaderlid, Operations Financial Markets, Artesia Banking Corporation, Brussels	Head/ Verantwoordelijke Operations Financial Markets
	April 2002	Directiekaderlid, Operations Financial Markets, DBB, Brussels	Head/ Verantwoordelijke Operations Financial Markets
Cloes, Jean-Paul	January 1996	Kaderlid, Interne audit participaties en marktenzaal, Bacob, Brussels	Auditeur/ auditor interne
	June 1999	Kaderlid, Interne audit Corporate banking, Artesia Services, Brussels	Auditeur/ auditor interne
	August 1999	Kaderlid, Audit participaties Gestion Institutionnel et Privé en Corporate banking, Artesia Services, Brussels	Auditeur/ auditor interne
	April 2002	Kaderlid, Audit Commercial Banking, DBB, Brussels	Auditeur/ auditor interne
	February 2004	Kaderlid, Auditeurs, DBB Brussels	Auditeur/ auditor interne
Coolen, Marleen	January 1996	Kaderlid, Juridische Zaken: International Corporate Asp., Bacob, Brussels	Juridisch adviseur/ jurist
	June 1999	Kaderlid, Juridische Zaken: Corporate, Artesia Services, Brussels	Juridisch adviseur/ jurist
	November 2000	Kaderlid, Legal Financial Markets, Brussels	Juridisch adviseur/ jurist
	April 2002	Kaderlid, Juridische Diensten – Team 5 Legal Corporate, Brussels	Juridisch adviseur/ jurist

Cools, Dirk	January 1996	Bediende, Corporate Banking, Paribas, Kortrijk	
	February 1997	Bediende, General Banking, Paribas, Oostende	
	January 1998	Bediende, Corporate Banking, Paribas, Kortrijk	Commercieel adjunct/ Adjunct Corporate Banking
	April, 1999	Bediende, Corporate Banking, Artesia Banking Corporation, Kortrijk	Commercieel adjunct/ Adjunct Corporate Banking
	January, 2000	Kaderlid, Corporate Banking, Artesia Banking Corporation, Kortrijk	Commercieel adjunct/ Adjunct Corporate Banking
	April 2002	Kaderlid, Corporate Banking, DBB, Kortrijk	Commercieel adjunct/ Adjunct Corporate Banking
Cordonnier, Piet	January 1996	Kaderlid, Corporate Banking: Projecten en Financiële Montages, Bacob, Brussels	Financial Engineer
	June 1999	Kaderlid, Niche Banking, Artesia Banking Corporation, Brussels	Senior Credit Officer/ Senior Legal and Credit Officer
	April 2002	Kaderlid, Juridische Diensten Team 5 Legal Corporate, DBB, Brussels	Senior Legal and Credit Officer
Dankelman, Françoise	January 1996	Kaderlid, Audit participations & Salle du marché, Bacob, Brussels	
	June 1999	Kaderlid, Audit Particip Gip Corp. Banking, Artesia Services, Brussels	
	February 2001	Kaderlid, Fin. Beheer Marktactiviteiten, Artesia Services, Brussels	
	April 2001	Kaderlid, Risk control, Artesia Services, Brussels	
	April 2001	Departed	
Dauwe, Geert	January 1996	Adjunct-Directeur, directeur Regio Brussel Brabant, Paribas, Brussels	
	January 1997	Directeur, General Banking, Paribas, Brussels	
	January 1998	Lid van het Directiecomité, Paribas, Brussels	
	April 1999	Lid van het Directiecomité, Artesia Banking Corporation, Brussels	
	March 2002	Departed	

09/30/2005 17:04 FAX

De Clerck, Filip	September 1997	Bediende, Universitaire Stageploeg, Paribas, Roeselare	
	February 1999	Bediende, Corporate Banking, Paribas, Roeselare	
	April 1999	Bediende, Corporate Banking, Artesia Banking Corporation, Roeselare	
	January 2001	Kaderlid, Corporate Banking, Artesia Banking Corporation, Roeselare	
	April 2002	Kaderlid, Corporate Banking, DBB, Roeselare	
	December 2003	Kaderlid, Corporate Banking, DBB, Kortrijk	Senior Operational Relationship Officer
De Coninck, Dennis	December 1997	Bediende, Secretariaat Gespecialiseerde Activiteiten, Paribas, Brussels	
	June 1999	Bediende, Legal Financial Markets, Artesia Services, Brussels	
	October 1999	Departed	
De Gendt, Freddy	January 1996	Kaderlid, Effectensecretariaat, Paribas, Brussels	
	June 1999	Kaderlid, Effectensecretariaat, Artesia Services, Brussels	
	June 2001	Kaderlid, Effectensignalitiek, Artesia Services, Brussels	
	April 2002	Kaderlid, Effectensignalitiek, DBB, Brussels	
	April 2005	Kaderlid, Effectendossiers en verzet op effecten, DBB, Brussels	Business Analyst
De Schaepdrijver, Thomas	October 1996	Kaderlid, Juristen, Paribas, Brussel	Juridisch Adviseur/ Jurist/Senior Legal Advisor
	June 1999	Kaderlid, Juridische Zaken Corporate.: Financial Markets & Asset & Liability Management, Artesia Services, Brussel	Juridisch Adviseur/ Jurist/Senior Legal Advisor
	October 1999	Kaderlid, Sales, Artesia Factors NV, Brussel	
	January 2001	Departed	

09/30/2005 17:04 FAX

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009/033

Decraene, Stefaan	January 1996	Manager Corporate Banking, Bacob, Brussels	
	March 1996	Onderdirecteur/Directeur, Corporate Banking, Bacob, Brussels	Hoofd Directie Corporate Banking
	January 1998	Directeur, Corporate Banking, Bacob, Brussels	Hoofd Directie Corporate Banking
	May 1999	Directeur, Investment Banking, Artesia Banking Corporation, Brussels	
	June 2000	President of the Direction Committee, Artesia Securities, Brussels	Chairman of the Management Board
	July 2001	Head of Wholesale Banking, DBB, Brussels	
	November 2001	President of the Direction Committee, Bank Artesia Nederland, Amsterdam	Chairman of the Management Board
	August 2002	Member of the Direction Committee, Bank Artesia Nederland, Amsterdam	Member of the Management Board
	July 2004	Lid van het Directiecomité, Dexia Bank Belgium, Brussels	Member of the Management Board
Devoegele, Jean-Luc	May 1998	Kaderlid, Juridische Zaken, Paribas, Brussels	Juridisch Adviseur/Jurist
	June 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Juridisch Adviseur/Jurist
	January 2000	Kaderlid, Participaties, Artesia Banking Corporation, Brussels	Juridisch Adviseur/Jurist
	April 2002	Kaderlid, Juridische Diensten - Team 2, DBB, Brussels	Juridisch Adviseur/Jurist/ Bedrijfsjurist
Dubois, Jean-Blaise	September 1998	Kaderlid, Universitaire Stageploeg, Paribas, Brussels	
	June 1999	Kaderlid, Juridische Zaken Corporate en Contentieux, Artesia Services, Brussels	
	April 2002	Kaderlid, Juridische Diensten Team 5, DBB, Brussels	Juridisch Adviseur/Jurist/ Bedrijfsjurist
Faict, Patrick	January 1996	Kaderlid, Stagiaireploeg, Paribas, Brussels	
	February 1996	Kaderlid, Gestructureerde Kredieten, Paribas, Brussels	
	March 1997	Kaderlid, Gespecialiseerde Corporate Banking Structured Finance, Paribas, Brussels	
	May 1997	Kaderlid, Corporate Banking Zetel World Trade Center, Paribas, Brussels	Senior Corporate Banker
	June 1999	Kaderlid, Corporate Banking World Trade Center, Artesia Services, Brussels	Senior Corporate Banker
	April 2000	Departed	

09/30/2005 17:05 FAX

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010/033

Ferrand, Bart	January 1996	Kaderlid, Corporate Banking, Paribas, Ieper	Account Officer
	February 1997	Kaderlid, Corporate Banking, Paribas, Roeselare	Corporate Banker
	April 1999	Kaderlid, Corporate Banking, Artesia Banking Corporation, Roeselare	Senior Corporate Banker
	November 1999	Kaderlid, Corporate Banking, Artesia Banking Corporation, Kortrijk	Senior Corporate Banker
	March 2001	Kaderlid, Structured Finance, Artesia Banking Corporation, Brussels	Senior Corporate Banker
	April 2002	Kaderlid, Structured Finance, DBB, Brussels	Senior Corporate Banker
Giovagnoli, Christine	March 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Bacob, Brussels	Juridisch Adviseur/ Jurist
	June 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Juridisch Adviseur/ Jurist
	April 2002	Kaderlid, Juridische Diensten Team 4, DBB, Brussels	Juridisch Adviseur/ Jurist
	October 2002	Departed	
Goffaux, Denoal	July 1997	Kaderlid, Juridische Zaken, Paribas, Brussels	Juridisch Adviseur/ Conseiller Juridique/ Legal Advisor/ Jurist
	June 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Head of Legal Corporate/ Legal Counsel/ Legal Advisor/ Responsable Legal Corporate
	April 2002	Kaderlid, Juridische Diensten Team 3, DBB, Brussels	Head of Legal Corporate/ Legal Advisor
Janssens, Jacques	January 1996	Kaderlid, Kredietbeheer, Paribas, Brussels	Directeur Gestion Risque/ Directeur Crédits
	April 1999	Kaderlid, Kredietbeheer, Artesia Banking Corporation, Brussels	Directeur Global Credit Risk
	September 2000	Directeur, Adviseur Corporate Banking, Artesia Banking Corporation, Brussels	
	April 2002	Directeur, Corporate Risk Advisor, DBB, Brussels	
	July 2002	Directeur, Parifibank, Dexia Bank Belgium, Brussels	Corporate Risk Advisor/ Gedelegeerd Bestuurder Parifibank

09/30/2005 17:05 FAX

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011/033

Lamiroy, Bernard	November 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Juridisch adviseur/ Jurist
	April 2002	Kaderlid, Juridische Diensten Team 5, DBB, Brussels	Juridisch adviseur/ Jurist/ Bedrijfsjurist
Legein, Manu	September 1997	Kaderlid, Universitaire stageploeg, Bacob, Brussels	Juridisch Adviseur/ Jurist
	June 1999	Kaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Juridisch Adviseur/ Jurist
	April 2000	Departed	
Milants, Gery	January 1996	Kaderlid, Origination, Paribas, Brussels	Legal Advisor Origination/ Manager Investment Banking
	June 1998	Kaderlid, Investment Banking, Paribas, Brussels	Senior Investment Banker
	June 1999	Kaderlid, Investment Banking, Artesia Banking Corporation, Brussels	Senior Investment Banker/ Manager Investment Banking
	August 1999	Kaderlid, Corporate Finance, Artesia Banking Corporation, Brussels	Senior Investment Banker/ Manager Investment Banking
	January 2001	Kaderlid, Artesia Securities, Artesia Banking Corporation, Brussels	Senior Investment Banker/ Manager Investment Banking
	January 2002	Directieadviseur, Artesia Securities, Artesia Banking Corporation, Brussels	Senior Investment Banker/ Manager Investment Banking
	April 2002	Directieadviseur, Corporate Finance, DBB, Brussels	Manager Investment Banking
	January 2003	Directieadviseur, Corporate Finance, DBB, Brussels	Manager Investment Banking
	September 2004	Directieadviseur, Structured Finance, DBB, Brussels	Manager Investment Banking

Mommens, Bernard	January 1996	Directiekaderlid, Juridische & Fiscale Zaken, Paribas, Brussels	Juridisch Adviseur/ Jurist
	March 1997	Directiekaderlid, Juridische Afdeling, Paribas, Brussels	Juridisch Adviseur/ Jurist
	June 1999	Directiekaderlid, Juridische Zaken Corporate & Contentieux, Artesia Services, Brussels	Juridisch Adviseur/ Jurist
	May 2000	Directiekaderlid, Private Banking, Artesia Banking Corporation, Brussels	Juridisch Adviseur/ Jurist
	April 2002	Directiekaderlid, Private Banking, DBB, Brussels	Juridisch Adviseur/ Jurist
Myny, Luc	January 1996	Bediende, Productexploitatie en Beheer, Bacob, Brussels	
	June 1999	Bediende, Operationele Verrichtingen (OVb), Artesia Services, Brussels	
	April 2002	Bediende, Beheer Gesalarieerd net, DBB, Brussels	
	June 2002	Bediende, Integratie contacten, DBB, Brussels	
	July 2003	Bediende, Agents Information Desk Betalingsverkeer, DBB, Brussels	
	September 2004	Bediende, Operators, DBB, Brussels	
Piret, Claude	January 1996	Lid van het Directiecomité, Bacob, Brussels	Bestuurder
	June 1999	Lid van het Directiecomité, Artesia Banking Corporation, Brussels	Bestuurder
	April 2002	Lid van het Directiecomité, DBB, Brussels	Bestuurder
	January 2004	Lid van het Directiecomité, Dexia S.A.	Chief Operations & Technology Officer
Probst, Alain	January 1996	Directiekaderlid, Credit Risk Management, Bacob, Brussels	
	January 1998	Directiekaderlid, Credit Risk Management Risk Monitoring, Bacob, Brussels	
	June 1999	Directiekaderlid, Credit Risk Management Risk Monitoring, Artesia Banking Corporation, Brussels	
	April 2002	Directiekaderlid, Credit Risk Management Guidelines + Risk Monitoring, DBB, Brussels	

09/30/2005 17:05 FAX

Rabaey, Peter	January 1996	Kaderlid, Krediet Secretariaat, Paribas, Brussels	
	September 1996	Kaderlid, Krediet Secretariaat Antwerpen en Limburg, Paribas	
	April 1998	Kaderlid, Secretariaat Gespecialiseerde Activiteiten, Paribas, Brussels	
	June 1999	Kaderlid, Nichebanking, Artesia Banking Corporation, Brussels	Senior Credit Officer/ Senior Credit Officer Global Credit Risk/ Senior Credit Officer Loans Secretariat Specialized Activities/ Senior Credit Officer Specialized Activities
	September 2000	Kaderlid, Structured Finance, Artesia Banking Corporation, Brussels	Senior Credit Officer/ Senior Corporate Banker Structured Finance
	April 2002	Kaderlid, Syndication, Structured and Project Finance, DBB, Brussels	Senior Corporate Banker Syndication, Structured and Project Finance
Saverys, François	January 1996	Directeur, Corporate Banking, Paribas, Brussels	
	January 1998	Directeur, Structured Trade Finance & International Banking Relations, Paribas, Brussels	
	April 1999	Directeur, Structured Trade Finance & International Banking Relations, Artesia Banking Corporation, Brussels	
	January 2000	Directeur, Credit Risk Management, Artesia Banking Corporation, Brussels	
	April 2002	Directeur, Credit Risk Management, DBB, Brussels	
	January 2005	Directeur, Kredieten aan ondernemingen Sociale en publieke instellingen, DBB, Brussels	

Steverlynck, Philippe	January 1996	Directeur, Krediet Secretariaat, Paribas, Brussels	Directeur Krediet Secretariaat Gespecialiseerde Activiteiten
	June 1999	Directeur, Corporate Banking, Artesia Banking Corporation, Kortrijk	
	December 2000	Directeur, Investment Banking, Artesia Banking Corporation, Brussels	Directeur Corporate Finance
	January 2001	Directeur, Artesia Securities, Brussels	Managing Director Artesia Securities
	April 2004	Directeur, Corporate Banking, DBB, Brussels	Director Artesia Securities
Tritz, Suzanne	January 1996	Kaderlid, Juridische & Fiskale Zaken, Paribas, Brussels	Juridisch Adviseur/Jurist
	March 1997	Kaderlid, Juridische Zaken, Paribas, Brussels	Juridisch Adviseur/Jurist
	April 1999	Kaderlid, Juridische Zaken: Corporate & Contentieux, Artesia Services, Brussels	Juridisch Adviseur/Jurist
	April 2002	Kaderlid, Juridische Diensten – Team 5 Legal Corporate, DBB, Brussels	Juridisch Adviseur/Jurist
Van Coillie, Etien	January 1996	Kaderlid, Bankverrichtingen, Paribas, Kortrijk	
	June 1999	Kaderlid, OVB: Betalingsverkeer, Artesia Banking Corporation, Kortrijk	Senior Corporate Banker West-Vlaanderen
	December 1999	Kaderlid, Corporate Banking, Artesia Banking Corporation, Kortrijk	Senior Corporate Banker
	July 2001	Kaderlid, Corp & Social Prof. Sales, Artesia Banking Corporation, Brussels	
	April 2002	Kaderlid, Corporate Sales, DBB, Brussels	
Van der Ven, Jan	August 1996	Directiekaderlid, Risico's binnenland, Paribas, Brussels	
	September 1996	Directiekaderlid, Commercieel Departement, Paribas, Brussels	
	October 1996	Directiekaderlid, Kredietbeheer, Paribas, Brussels	Loans Secretariat Specialized Activities Manager/ Directeur Kredietsecretariaat
	March 1999	Departed	

09/30/2005 17:05 FAX

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015/033

Van Hove, Nadia	July 1997	Kaderlid, Investment Banking, Paribas, Brussels	Manager Corporate Research
	June 1999	Kaderlid, Investment Banking, Artesia Banking Corporation, Brussels	Manager Corporate Research
	January 2001	Kaderlid, Private Equity, Artesia Banking Corporation, Brussels	Investment Manager
	April 2002	Kaderlid, Dexia Ventures/Private Equity, DBB, Brussels	Investment Manager
Van Riet, Karel	January 1996	Kaderlid, Credit Risk Management, Bacob, Brussels	Procuratiehouder
	January 1999	Directiekaderlid, Credit Risk Management, Bacob, Brussels	Onderdirecteur Credit Risk Management
	June 1999	Directiekaderlid, Juridische Zaken: Corporate & Contentieux, Artesia Services, Brussels	Directeur Juridische Zaken Corporat en Contentieux
	April 2002	Directiekaderlid, Juridische Diensten – Team 5 Legal Corporate, DBB, Brussels	Adjunct-Directeur Juridische Diensten/ Deputy Manager
Van Tiggel, Patrick	January 1996	Kaderlid, Risicobeheer marktzaalactiviteiten, Bacob, Brussels	
	January 1998	Directiekaderlid, Sociale & Publieke Sector, Bacob, Brussels	Onderdirecteur Global Credit Risk
	June 1999	Directiekaderlid, Gespecialiseerde activiteiten, Artesia Banking Corporation, Brussels	Senior Manager Credit Risk
	April 2002	Directiekaderlid, Midcorp & Specials, DBB, Brussels	Senior Manager Credit Risk
	January 2005	Directiekaderlid, Kredieten aan Ondernemingen. Direct Approach & Specials, DBB, Brussels	Senior Manager Credit Risk
Vander Elst, Serge	January 1996	Kaderlid, Fiscale Zaken, Bacob, Brussels	Fiscaal Adviseur/ Tax Advisor
	June 1999	Kaderlid, Fiscale Zaken: advies, Artesia, Brussels	Fiscaal Adviseur/ Tax Advisor
	April 2002	Kaderlid, Fiscale Adviezen, DBB, Brussels	Fiscaal Adviseur/ Tax Advisor

09/30/2005 17:05 FAX

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016/033

Vermeylen, Christine	January 1996	Kaderlid, Marktenzaal: Juridische Cel, Bacob, Brussels	
	May 1996	Kaderlid, Marktenzaal: LT funding, Bacob, Brussels	
	November 1998	Kaderlid, Legal, Bacob, Brussels	
	June 1999	Kaderlid, Legal Financial Markets, Artesia, Brussels	
	July 2000	Departed	
Wynants, Heidi	February 1996	Kaderlid, Marktenzaal: Thesaurie, Bacob, Brussels	Legal & Compliance Officer
	April 1996	Kaderlid, Marktenzaal: Juridische Cel, Bacob, Brussels	Legal & Compliance Officer
	September 1998	Kaderlid, Risk Management: Legal Financial Markets, Artesia Banking Corporation, Brussels	Legal Risk Manager
	February 2000	Departed	
	April 2000	Kaderlid, Afdeling financieel recht & financiële markten, Gemeentekrediet, Brussels	
	April 2002	Kaderlid, Juridische Diensten-Team 3, DBB, Brussels	Company Lawyer Securities & Financial Markets

In addition, Dexia does not dispute that the following individuals are or were officers, directors or managing agents of Dexia Bank Belgium or Dexia S.A. during the relevant time period:

Avonts, Rene
Dauwe, Geert
Decraene, Stefaan
Janssens, Jacques
Mommens, Bernard
Piret, Claude
Probst, Alain
Saverys, Francois
Stevelynck, Philippe

Of these individuals, Dexia does not dispute that Stefaan Decraene and Claude Piret are current officers, directors or managing agents of Dexia Bank Belgium or Dexia S.A.

09/30/2005 17:05 FAX

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017/033

Interrogatory No. 2

Identify all members of the board of directors of Artesia Banking Corporation, S.A. during the Relevant Time Period, including the dates of service for each board member.

Response to Request No. 2

Without waiving the foregoing objections or the General Objections, Dexia responds to this Interrogatory as follows:

NAME	DATES OF SERVICE
Allegaert, Guido	April 1999 - March 2002
Avonts, René	April 1999 - March 2002
Bouteille, Michel	August 2001 - March 2002
Branson, Rik	April 1999 - March 2002
Bruneel, Dirk	April 1999 - March 2002
Dauwe, Geert	April 1999 - March 2002
Decamps, Martine	August 2001 - March 2002
Descampe, Edouard	April 1999 - August 2001
De Wilde, Julien	April 1999 - August 2001
Duyck, Rik	April 1999 - March 2002
Ford, Maureen	April 1999
Genten, Luc	April 1999 - August 2001
Greindl, Renaud	April 1999 - March 2002
Hocm, Dominique	April 1999
Justaert, Marc	August 2001 - March 2002
Manset, Christian	April 1999
Marchand, Gérard	April 1999 - August 2001
Martin, Jean-François	August 2001 - March 2002
Moesen, Willem	April 1999 - August 2001
Neuckermans, Roland	April 1999 - August 2001
Onclin, Luc	August 2001 - March 2002
Piette, Josly	April 1999 - March 2002
Pinte, Christian	April 1999 - March 2002
Piret, Claude	April 1999 - March 2002
Reding, Paul	April 1999 - August 2001
Richard, Pierre	August 2001 - March 2002

NAME	DATES OF SERVICE
Rombouts, Theo	April 1999 - March 2002
Roelandt, Guy	April 1999 - August 2001
Romagnoli, Philippe	April 1999 - March 2002
Scheins, Paul	April 1999 - August 2001
Soete, Robert	April 1999 - August 2001
Swiggers, Francine	April 1999 - March 2002
Tinant, Marc	April 1999 - August 2001
Van Broeckhoven, Jan	April 1999
Van Cayseele, Patrick	April 1999 - August 2001
Williamme, Luc	April 1999 - August 2001

Interrogatory No. 3

For each of the persons listed in Interrogatory No. 1 and/or identified in your response to Interrogatory No. 2 who does not currently hold a position at Dexia, state (a) the date of termination, (b) the reason for termination, and (c) the last known business and home address.

Response to Request No. 3

Dexia objects to this Interrogatory because the term "termination" presumes that employees who have departed from the bank were terminated involuntarily. Dexia will respond to this Interrogatory as if the term "departure" were used instead of "termination." Dexia objects to this Interrogatory to the extent it seeks a "reason for termination" for employees who have departed voluntarily because it is impossible for Dexia to know the employee's true reason(s) for leaving the bank. Dexia will respond to this portion of the Interrogatory only to the extent the employee provided the bank with a reason for his or her departure. Dexia objects to this Interrogatory to the extent that it seeks information for certain former members of the Artesia board of directors listed in the response to Interrogatory No. 2, because such information is not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the General Objections, Dexia responds to this Interrogatory as follows: